

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

OCT 25 2018

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

FELICIA BATTLE,

Defendant.

4:18CR880 AGF/NCC

INDICTMENT

COUNT ONE

The Grand Jury charges:

On or about October 28, 2016, within the Eastern District of Missouri, the defendant,

FELICIA BATTLE

did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact for the purpose of influencing the action of Plaza Home Mortgage, Inc., a mortgage lender granting mortgage loans insured by the Federal Housing Administration, in connection with a Federal Housing Administration mortgage loan application, in that the defendant, **FELICIA BATTLE**, in a document entitled "Uniform Residential Loan Application," did state and represent and cause to be stated and represented that she received \$2,859.00 per month in Social Security Disability Income, when in truth and in fact, as the defendant **FELICIA BATTLE** well knew, she was receiving a total of approximately \$1,470.00

per month in Social Security Disability Income on **FELICIA BATTLE'S** Social Security Record and on **FELICIA BATTLE'S** minor child's Social Security record.

In violation of Title 18, United States Code, Section 1014.

COUNT TWO

The Grand Jury further charges:

On or about January 1, 2017, within the Eastern District of Missouri, the defendant,

FELICIA BATTLE,

did embezzle, steal, purloin, or knowingly convert to her use, and the use of others, money of the United States or of any department or agency thereof, to wit: \$1,396.50 in the form of Social Security Administration Disability benefit payments, creating a total loss to the government in excess of \$1,000.00.

In violation of Title 18, United States Code, Section 641.

COUNT THREE

The Grand Jury further charges that:

On or about February 9, 2017, within the Eastern District of Missouri, the defendant,

FELICIA BATTLE,

did embezzle, steal, purloin, or knowingly convert to her use, and the use of others, money of the United States or of any department or agency thereof, to wit: \$1,122.55 in the form of childcare provider benefits, creating a total loss to the government in excess of \$1,000.00.

In violation of Title 18, United States Code, Section 641.

COUNT FOUR

The Grand Jury further charges that:

Between May 1, 2016 and July 31, 2016, within the Eastern District of Missouri, the defendant,

FELICIA BATTLE,

did embezzle, steal, purloin, or knowingly convert to her use, and the use of others, money of the United States or of any department or agency thereof, to wit: \$1,414.00 in the form of food stamp benefits, creating a total loss to the government in excess of \$1,000.00.

In violation of Title 18, United States Code, Section 641.

COUNT FIVE

The Grand Jury further charges:

On or about December 1, 2016, within the Eastern District of Missouri, the defendant,

FELICIA BATTLE

in a matter within the jurisdiction of the United States Department of Agriculture, a department of the United States, did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact and did make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, in a document entitled "Change Report," she did state and represent

and cause to be stated and represented that she had a monthly rent payment of \$1,200.00, when **FELICIA BATTLE** well knew she did not, and she was actually paying a monthly mortgage payment for her home of approximately \$800.00.

In violation of Title 18, United States Code, Section 1001(a).

COUNT SIX

The Grand Jury further charges:

On or about March 14, 2017, within the Eastern District of Missouri, the defendant,

FELICIA BATTLE

in a matter within the jurisdiction of the United States Department of Agriculture, a department of the United States, did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact and did make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, in a document entitled "Application for Food Stamp Benefits," she did state and represent and cause to be stated and represented that she had a monthly house payment of \$1,500.00, when **FELICIA BATTLE** well knew she did not, and she was actually paying a monthly mortgage payment for her home of approximately \$800.00.

In violation of Title 18, United States Code, Section 1001(a).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 982(a), upon conviction of an offense in violation of Title 18, United States Code, Section 1014 as set forth in Count I, the defendant shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained directly or indirectly, as the result of such violation.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense.

3. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 641 as set forth in Counts II, III and IV, the defendant shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to said violation.

4. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said violation.

5. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided
without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to
Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN,
United States Attorney

DIANE E.H. KLOCKE, #61670MO
Special Assistant United States Attorney